



**Lowenstein
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April 5, 2023

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VIA ECF

Hon. Denise L. Cote, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: SEC v. Joanna Lanni, Civil No. 22-4736 (DLC)

Dear Judge Cote:

This firm is counsel to Defendant Joanna Lanni (“Ms. Lanni”) in the above-referenced matter. We write on behalf of Ms. Lanni, with the consent of Karen Rosenberger and the SEC, to request permission to take two third-party depositions after the close of fact discovery to accommodate the deposition witnesses’ schedules.

The fact discovery deadline is April 7, 2023. On March 7, 2023, we noticed the deposition by written questions of non-party John Murdock, the former Senior Director of Procurement and Business Operations at Synchronoss Technologies, Inc. (“Synchronoss”), for April 5, 2023. Similarly, on March 8, 2023, we noticed the deposition by written questions of non-party Noah Ament, Synchronoss’ Global Deal Desk Director, for April 6, 2023. Counsel for Mr. Ament and counsel for Mr. Murdock then informed us that they are unavailable to sit for depositions on these dates or on any other dates during the fact discovery period. Therefore, to accommodate the witnesses, the parties have consented to the first available date that works for the witnesses and their counsel—April 12, 2023 for Mr. Murdock, and April 13, 2023 for Mr. Ament.

This request will not change any deadlines in the Pretrial Scheduling Order. The SEC consents to this request. We therefore respectfully request the Court’s permission to conduct Messrs. Murdock and Ament’s depositions on April 12 and April 13, 2023.

*Granted.
Denise Cote
4/5/23*

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We thank the Court for its consideration of this matter and are available at Your Honor's convenience should the Court wish to discuss this request.

Respectfully submitted,

/s/ Scott B. McBride

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cc: All counsel of record (via ECF)